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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LORELIE TOTANES,  
Individually,  
  
Plaintiff,

vs.

TARGET CORPORATION d/b/a TARGET,  
a foreign corporation; DOES I through X, and  
ROE CORPORATIONS XI through XX,  
inclusive  
  
Defendants.

Case No. 2:23-CV-01681-APG-DJA

**ORDER TO  
EXTEND DISCOVERY (First  
Request)**

**As amended on page 3**

Plaintiff, LORELIE TOTANES, by and through her attorneys of record, ANGULO LAW GROUP, and Defendant, TARGET CORPORATION, by and through their counsel of record, LINCOLN, GUSTAFSON & CEROS, (collectively, “the Parties”) submit the following Stipulation and proposed Order pursuant to LR 26-3 hereby agreeing to a one hundred and twenty (120) day continuance of the current discovery deadline to give the parties additional time to conduct discovery.

**I. STATEMENT OF DISCOVERY COMPLETED TO DATE**

1. The Parties participated in the Rule 26(f) conference on December 18, 2023.
2. Plaintiff served her Initial Disclosures on December 11, 2023.
3. Plaintiff served her Initial Disclosures (First Supplement) on December 13, 2023.
4. On December 19, 2023 Plaintiff propounded Requests for Production of Documents to

Defendant

5. On December 19, 2023 Plaintiff propounded Interrogatories to Defendant
6. On January 2, 2024 Plaintiff propounded Requests for Admission to Defendant
7. On January 30, 2024 Defendant propounded Interrogatories to Plaintiff
8. On January 30, 2024 Defendant propounded Requests for Production of Documents to

Plaintiff

9. Defendant served its Initial Disclosures on January 30, 2024.
10. On February 15, 2024 Defendant propounded its Responses to Plaintiff's Requests for
- Admissions.
11. Defendant served its Initial Disclosures (First Supplement) on February 22, 2024.
12. On February 22, 2024 Defendant propounded its Answers to Plaintiff's Interrogatories.
13. On February 22, 2024 Defendant propounded its Responses to Plaintiff's Requests for

Production of Documents

14. Defendant served its Initial Disclosures (Second Supplement) on February 23, 2024.
15. On February 27, 2024 Plaintiff propounded her Answers to Defendant's Interrogatories
16. On February 27, 2024 Plaintiff propounded her Responses to Defendant's Request for
- Production of Documents.

17. Plaintiff served her Initial Disclosures (Second Supplement) on March 6, 2024.
18. Plaintiff served her Initial Disclosures (Third Supplement) on March 7, 2024.
19. Plaintiff served her Initial Disclosures (Fourth Supplement) on March 7, 2024.

## **II. STATEMENT OF DISCOVERY THAT NEEDS TO BE COMPLETED**

1. Deposition of the Plaintiff
2. Deposition of Target Corporation's Rule 30(b)(6) witness
3. Depositions of Defendants employees: Doyal Conner, Dean Dezmond, Dave Greger and

Kaitlyn Wathen

4. Deposition of Plaintiff's husband
5. Deposition of witness Raymond Villalobos
6. Depositions of Plaintiff's treating physicians
7. Initial expert disclosures
8. Rebuttal expert disclosures
9. Expert witness depositions
10. Additional written discovery

### III. REASONS WHY DISCOVERY SHOULD BE EXTENDED

The parties are diligently engaged in discovery. Prior to December 5, 2023 jurisdiction in this matter was unclear to the parties due to the filing of a Motion to Remand. The parties are seeking a one hundred twenty (120) day continuance of the current discovery deadlines to give the parties sufficient time to conduct the discovery remaining in this matter as outlined above.

### IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

It is hereby stipulated that the discovery cutoff deadline be extended for a period of one hundred twenty (120) days. If approved, the new discovery deadline would be modified as follows:

<u>Task</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Last day to amend pleadings and add parties	March 5, 2024	July 3, 2024
Last day to disclose initial experts and reports	April 4, 2024	August 2, 2024
Last day to disclose rebuttal experts and reports	May 4, 2024	September 6, 2024
Discovery cutoff	June 3, 2024	October 1, 2024
Last day to file dispositive motions	July 3, 2024	October 31, 2024

1 Pre-Trial Order	2 August 2, 2024	3 December 2, 2024 <sup>2</sup>
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4 DATED this 7<sup>th</sup> day of March, 2024.

DATED this 7<sup>th</sup> day of March, 2024.

5 ANGULO LAW GROUP

LINCOLN, GUSTAFSON & CERCOS, LLP

6 By /s/ Peter M. Angulo  
 7 PETER M. ANGULO, ESQ.  
 8 Nevada Bar No. 003672  
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 10 Las Vegas, Nevada 89120  
 11 Attorneys for Plaintiff

By /s/ Julie Funai  
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 Las Vegas, Nevada 89128  
 Attorneys for Defendant

### 12 ORDER

13 IT IS SO ORDERED

14 DATED: March 8, 2024

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DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

28 <sup>2</sup> This deadline falls on Saturday, November 30, 2024. As a result, this deadline extends to the next court day of Monday, December 2, 2024, by operation of Fed. R. Civ. P. 6.

## Margaret Anthis

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**From:** Julie Funai <JFunai@lgclawoffice.com>  
**Sent:** Thursday, March 7, 2024 4:01 PM  
**To:** Margaret Anthis  
**Cc:** Peter Angulo; Loren Young; Cheryl Giammona; Kimberly Glad  
**Subject:** RE: Totanes v. Target

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**Julie Funai, Esq.**  
Attorney - Nevada  
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**From:** Margaret Anthis <manthis@angulolawgroup.com>  
**Sent:** Thursday, March 7, 2024 1:38 PM  
**To:** Julie Funai <JFunai@lgclawoffice.com>  
**Cc:** Peter Angulo <pangulo@angulolawgroup.com>; Loren Young <lyoung@lgclawoffice.com>; Cheryl Giammona <CGiammona@lgclawoffice.com>; Kimberly Glad <KGlad@lgclawoffice.com>  
**Subject:** RE: Totanes v. Target

Attached please find a draft Stip and Order to Extend Discovery. Please let me know if you have any changes. If you have no changes please let me know if we can use your e-signature. Thanks.

Margaret Anthis  
Legal Secretary  
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**From:** Julie Funai <JFunai@lgclawoffice.com>  
**Sent:** Thursday, March 7, 2024 11:07 AM  
**To:** Margaret Anthis <manthis@angulolawgroup.com>  
**Cc:** Peter Angulo <pangulo@angulolawgroup.com>; Loren Young <lyoung@lgclawoffice.com>; Cheryl Giammona